

**Is it really that simple?**

**exchanges on implementation practices of  
GBER Articles 20&20a + de minimis**

Grzegorz Golda, Przemyslaw Kniaziuk | Interact 13.05.2025 |

Krakow, Poland

**Interact**



**Co-funded by  
the European Union**  
Interreg

**Name / Programme**

**What is positive regarding State aid control?**

**What is negative regarding State aid control?**

# Where do we stand?



GBER set to expire at the end of 2026 – no new draft yet



De minimis set to expire at the end of 2029



De minimis central register set at national or EU level as of 1 January 2026 – consultation regarding central register

# De minimis registers



10 EU MS currently WITHOUT the national registries  
AT, BE, DE, DK, FI, FR, GR, IE, NL, SE



16 EU MS currently WITH the national registries:  
BG, HR, CY, CZ, EE, ES, HU, IT, LV, LT, LU, PL, PT, SI, RO, SK

**What is the approximate number of projects with State aid in your programme?**

**What would be the approx. relation all projects / projects with State aid relevant activities (just ballpark figures)?**

**What State aid approaches did you actively use?**

**Art. 20? Art. 20a? Other GBER articles? De minimis?**

**Any approximate numbers/proportions?**

**How do you do State aid assessments in your programme?**

**Is this system successful or do you plan to change it in the future?**

**Do the Monitoring Committee members intervene in the whole process?**

**Do the Members provide you with assistance?**



**What was the most challenging situation / project related to State aid that you had to solve?**

**How was it solved?**

**Did you have to ask EC for assistance?**

**Do you have a direct access to TAM?**

**If not, which institution does?**

**How do you communicate partners activities to be published?**

**Are you able to do bulk reporting in TAM?**

**Do you have a direct access to SARI?**

**If not, which institution does?**

**How do you communicate on partners activities to be published?**

**Do you have read/write access to State aid wiki?**

**Did you ask there any question(s)?**

**Do you find it useful?**

**Are there any discussions on the MS level regarding the union de minimis register (if there is no national de minimis)?**

**Were you invited to participate?**

**Do you know if you will you be granted access to the union de minimis register?**

## **GBER Post-2026 recommendations**

**Do you have any further requests  
for the post-2026 GBER (e.g.  
max. intensity level higher, TAM  
reporting simplified,  
definitions)?**

**Any other topic related to State aid that you would like to mention?**